TABLE OF CONTENTS

INTR	ODUCTION					
FACTUAL BACKGROUND						
A.	Claims Against US Transportation					
	1.	US Transportation Agreement I	2			
	2.	US Transportation Agreement II	3			
B.	Clain	ns Against US Bulk and US Bulk Transport	3			
STANDARD OF REVIEW						
A.	Motion to Dismiss4					
B.	More Definitive Statement					
ARGUMENT						
A.	Counts II and VI of the Complaint Must Be Dismissed Because the Plaintiff Lacks Standing to Assert a Claim for Violation of the Delaware Consumer Fraud Act Because There are no Allegations of Transactions in Delaware in Which Plaintiff was a Consumer					
	1.	Plaintiff has not Alleged that it was a Consumer	5			
	2.	No Consumer Acts Alleged to Have Occurred in Delaware	6			
B.	Counts II and VI of the Complaint Must Be Dismissed Because the Plaintiff Lacks Standing to Assert a Violation of the Delaware Deceptive Trade Practices Act					
	1.	No Competition Status Alleged by Plaintiff in the Complaint	7			
	2.	Attorney's Fees and Costs Should be Awarded to Defendants	8			
C.	The Complaint Must Be Dismissed Because Plaintiff Lacks Standing to Assert Violations of The Florida and Pennsylvania Unfair Trade Practices and Consumer Protection Laws					
	1.	The Florida Act				
	B. STAN A. ARGI	FACTUAL A. Clair 1. 2. B. Clair STANDARI A. Moti B. More ARGUMEN A. Coun the P the D Alleg was a 1. 2. B. Coun the P Dece 1. 2. C. The C Stand Unfair	FACTUAL BACKGROUND			

			a.	No Such Florida Statute as Alleged by Plaintiff in the Complaint	9		
			b.	Plaintiff has not Alleged that it was a Consumer	9		
			c.	No Florida Acts Alleged by Plaintiff in the Complaint	11		
			d.	If the Plaintiff is Found to have Standing as a Consumer, Defendants Request a Bond	11		
		2.	The P	Pennsylvania Act	12		
			a.	Plaintiff has not Alleged that it was a Consumer	12		
			ъ.	No Pennsylvania Acts Alleged by Plaintiff in the Complaint	12		
	D.	Becau	ise Plair	and V of the Complaint Must Be Dismissed ntiff Fails to Either Attach a Copy of The Alleged r Sufficiently Describe the Agreements	12		
	E.	The Defendants Are Entitled To A More Definite Statement					
V.	CONCLUSION16						